

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

10 FEB 1981

SUBJECT:

Stauffer Chemical Company, 1415 South 47th St.,  
Richmond, California

FROM:

Chip Demarest, Environmental Scientist  
Hazardous Material Section

TO:

Kenneth Yelsey, Environmental Scientist  
Hazardous Material Section

Robert Mandel, Chief, Hazardous Material Section

## I. Background

Under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), an inspection was conducted at Stauffer Chemical Company on December 3, 1980 by Kenneth Yelsey and Chip Demarest of the Hazardous Materials Section, Surveillance and Analysis Division. The inspection was conducted at the request of Enforcement Division, Water Branch to assess the facility's compliance with RCRA Interim Status Standards for notifiers engaged in hazardous waste activity.

## II. Investigation

The inspectors presented their credentials and were received by Mr. Elwood G. Trimpey, Assistant to Plant Manager. Mr. Edwin S. Anderson, Chief Chemist, later joined in the meeting.

The company has operated at this site since the early 1900's, producing agricultural chemicals. The infrastructures include laboratories, warehouses, offices, and a series of treatment ponds bordering on San Francisco Bay. The ponds are used to neutralize acidic and alkaline liquid wastes. The company operates these treatment ponds under a California Water Quality Control Act permit. Mr. Anderson stated that the ponds do not receive hazardous waste materials or exhibit hazardous characteristics. Due to inclement weather on the day of inspection, a visual examination of the ponds was not conducted.

The Stauffer Chemical, Richmond plant had originally notified EPA that their hazardous waste activities include generation and treatment/storage/disposal (see Appendix A). However, in a letter addressed to Bill Wilson at EPA, Mr. Trimpey indicated that Stauffer Chemical qualifies as a generator of hazardous waste but not as a TSD facility (see Appendix B). Their EPA I.D. number is CAD009123456.

Regarding the company's attempted compliance with Part 262- Standards Applicable to Generators of Hazardous Waste, the following items are included as evidence:

1. Appendix C - a copy of the EPA I.D. numbers of the waste haulers employed by Stauffer;
2. Appendix D - a copy of a Hazardous Waste Manifest for waste taken from the site on November 20, 1980.

The company determined the hazard quality of their wastes from the EPA lists and through testing at their Richmond Research Center and company headquarters in Westport, Connecticut. (A copy of the waste analysis report was examined, but permission to photocopy it was withheld, pending headquarters approval).

The company representatives indicated in conversation that their facility does comply with the DOT regulations on packaging, labelling, marking and placarding for wastes to be transported off-site. Mr. Trimpey stated that the maximum accumulation time for on-site waste is approximately 60 days, and that no waste is exported to foreign countries. Accumulation dates were observed on the containers. Mr. Trimpey maintains a company "Solid Waste Disposal Procedures" manual in his office. Examination of this manual by the inspectors revealed the company's written intentions to comply with Subpart D - Recordkeeping and Reporting. The inspectors also examined the facility's Contingency Plan and Preparedness/Prevention and found them to be in compliance.

Appendix D is a report on the results of some waste analyses performed by the company. Appendix F contains photos of their waste labelling practices and containment area. Appendices E and F were provided by Stauffer Chemical and mailed to the inspectors subsequent to the investigation.

### III. Suspected Violations

No violations or potential violations were noted during the investigation.

Appendices:

- A. Notification of Hazardous Waste Activity
- B. Letter from Stauffer Chemical to EPA
- C. EPA I.D. numbers for Transporters
- D. California Hazardous Waste Manifest
- E. Waste Analyses
- F. Photos